

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
V.	§	Case No. 6:23-cv-00321
	§	
ROY W. HILL, et al.	§	

**RECEIVER’S FOURTH REPORT AND
UNOPPOSED RECOMMENDATION FOR CLAIM APPROVAL**

Receiver Albert C. Black III (“Receiver”) reports and recommends to the Court as follows:

Introduction

1. This fourth claims recommendation involves another unusual circumstance that the Receiver recommends be addressed at this stage of the case. One of Defendant Eric Shelly’s relatives has credibly identified certain gold and silver coins and laid claim to them. Under applicable law, the correct result is to approve the claim and to release this property.

Legal Standard

2. Where a claimant can identify specific property held by a receiver, it is proper to allow a claim for turnover of the subject property. 3 Clark on Receivers § 662.1(a), at 1174.

Facts

3. The claimant in question is Margaret Ann Lee. She is Mr. Shelly’s mother-in-law. She resides with Mr. Shelly’s sister-in-law.

4. Ms. Lee has laid claim to a portion of the gold and silver coins that the Receiver found in Shelly’s residence. Shelly had a number of unmarked sets of gold and silver coins that the Receiver secured. Ms. Lee has produced a receipt and a wire pertaining to the purchase of “50 Canadian Silver Leaf 1 oz” coins and “54 American Gold Eagle 1 oz” coins. She has explained that Mr. Shelly was keeping these coins for her. Mr. Shelly does not disagree.

5. The receipt indicates the coins were purchased for \$100,137.00.

6. The Receiver has not located additional documentation contradicting what Ms. Lee has presented, and the Receiver has the Receiver has coins matching this description.

Recommendation

7. Based upon the foregoing, the Receiver recommends that Ms. Lee's claim be allowed and that the coins be released to Ms. Lee.

WHEREFORE, the Receiver prays that the Court enter an order to such effect.

Respectfully submitted,

/s/ Dennis Roossien

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COUNSEL FOR RECEIVER

CERTIFICATE OF CONFERENCE

I hereby certify that this motion is supported by the Plaintiff, and is not opposed by the individual defendants.

/s/ Dennis Roossien

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of February, 2025, a true and correct copy of the foregoing instrument was served electronically in compliance with the Court's Electronic Filing Procedures on all counsel of record who are deemed to have consented to electronic service.

/s/ Dennis Roossien